



# Sierra Club Mother Lode Chapter

P.O. BOX 1335, SACRAMENTO, CALIFORNIA 95812-1335

July 19, 1995

Mr. Patrick McCarty, Chair  
Delta Protection Commission  
14219 River Road, PO Box 530  
Walnut Grove, CA 95690

Dear Mr. McCarty:

In its July 10 issue, the **Sacramento Business Journal** described the position which the Delta Protection Commission has taken with regard to the use of "biosolids" by farmers within the primary zone of the Delta. We write to express to you our concern about this position and to request notice from the Commission of any future hearings or decisions on this issue.

The Delta Protection Commission apparently decided earlier this year that land application of biosolids represents a threat to soil or water quality within the Delta. Based on our study of the issue, we believe to the contrary that biosolids use in the Delta would be a benefit to soil and water quality and help strengthen the farm economy, i.e. help achieve the objectives of the Delta Protection Act. Land application of biosolids also presents a significant opportunity for beneficially recycling materials that might otherwise contribute to waste disposal problems.

These benefits of biosolids use account for the fact that land application – subject to the constraints and safeguards provided by the existing regulatory framework – enjoys significant support from environmental organizations and regulatory agencies concerned with water quality and solid waste management.

We urge the Delta Protection Commission to reconsider its position on biosolids and we respectfully ask that you provide us with notice of any future Commission consideration of actions in this area.

Sincerely,

Brad Bristow  
Chair, Conservation Committee  
Mother Lode Chapter, Sierra Club

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July 20, 1995

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Re: Resolution on the San Luis Drain

Members of the Delta Protection Commission:

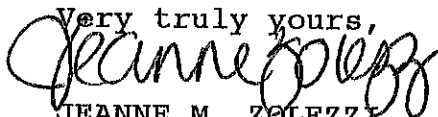
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On behalf of the Stockton East Water District, I would urge the Delta Protection Commission to adopt Resolution B regarding the San Luis Drain which you will consider at Item 10 on your July 27, 1995 agenda.

The Stockton East Water District and numerous other San Joaquin cities and districts are severely and adversely impacted by the current drainage situation on the San Joaquin River.

Page 7 of your staff report indicates that from 1982 through 1992 levels of dissolved solids in the San Joaquin River near Vernalis have ranged from about 110 to 900 milligrams per liter. These levels were achieved only after from 70,000 to over 200,000 acre-feet of water annually are released from New Melones Reservoir in order to dilute this pollution which is allowed to be discharged into the San Joaquin River. If not used for pollution dilution, this water could be made available to San Joaquin County districts for agricultural, municipal and industrial uses.

Obviously the drain is but one solution to the problem. Nevertheless, it is a solution which should be studied to determine if it is viable, and if it can be carried out in a way which will not harm Delta conditions. We recognize the charge of the Delta Protection Commission. In addition, however, Resolution B recognizes that your charge may still be met while considering other options.

Very truly yours,  
  
JEANNE M. ZOLEZZI  
Attorney-at-Law

JMZ:des  
cc: Edward M. Steffani  
Alex Hildebrand

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION**

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21 July 1995

Patrick McCarty, Chairman  
Delta Protection Commission  
P.O. Box 530  
Walnut Grove, CA 95690

**PROPOSED RESOLUTION REGARDING THE SAN LUIS DRAIN**

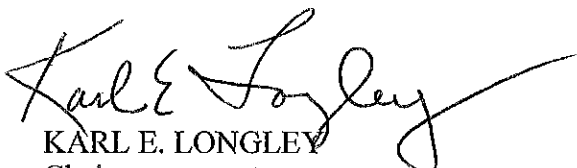
We note that the Delta Protection Commission is considering two alternative resolutions regarding the San Luis Drain at its 27 July 1995 meeting. One resolution would oppose a release from the Drain into the Delta and the alternative would support the Commission's participation in any public meetings regarding the future of the San Luis Drain.

The Central Valley Regional Water Quality Control Board has, through its Basin Plan, continually supported the construction of facilities to convey agricultural drain water from the San Joaquin and Tulare Lake Basins. A valley-wide conveyance facility is the only feasible, long-range solution for achieving a salt balance in the Central Valley and alleviating the continuing salinity problems encountered in the San Joaquin River and South Delta. The Regional Board favors the construction of a valley-wide drain but only under the following conditions:

- All toxicants would be reduced to a level which would not harm beneficial uses of receiving waters;
- The discharge would be governed by specific discharge and receiving water limits in an NPDES permit; and
- Long-term continuous biological monitoring would be required.

Obtaining a salt balance is essential to the future of irrigated agriculture in the Central Valley. Solutions to the continual buildup of salt in agricultural lands and, in particular, to the salinity problems they cause in the San Joaquin River and South Delta will require a working partnership between a number of water users. The Basin Planning process and the discharge permitting process are two mechanisms that are available to ensure the environmental protection of the Delta. We urge your Commission to work closely with us and the State Water Resources Control Board, through the public process, as we develop long-term plans for the continued viability of the Valley economy and the critical need for environmental protection in the Delta.

I thank you for the opportunity to comment on your resolution.

  
KARL E. LONGLEY  
Chairman

cc: Regional Board Members  
John Caffrey, State Water Resources Control Board